

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

WILDER REED,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:10-cv-00223-LMB-TCB
)	
WASHINGTON GAS LIGHT COMPANY,)	
)	
Defendant.)	

ANSWER

Washington Gas Light Company (Washington Gas) answers the Complaint as follows:

First Defense

The Complaint fails to state any claim upon which relief can be granted.

Second Defense

In reply to the numbered paragraphs of the Complaint, Washington Gas states:

Paragraph 1

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Paragraph 2

Washington Gas admits that it is incorporated in the District of Columbia and the Commonwealth of Virginia. Washington Gas admits further that it has an operations center in Springfield, Virginia, and that plaintiff worked at this location.

Paragraph 3

Paragraph 3 makes allegations about jurisdiction only, to which no answer is required.

Paragraph 4

Admitted.

Paragraph 5

Washington Gas admits that it hired plaintiff on November 12, 2002.

Paragraph 6

Denied.

Paragraph 7

Admitted.

Paragraph 8

Denied.

Paragraph 9

Admitted.

Paragraph 10

Washington Gas admits that plaintiff was promoted to Gas Controller II in December 2008 and that he received a raise.

Paragraph 11

Admitted.

Paragraph 12

Denied.

Paragraph 13

Washington Gas is without sufficient information to form a belief as to what plaintiff may have “noticed,” and denies that it does not take action in the event an employee complains of inappropriate employee remarks.

Paragraph 14

Washington Gas is without sufficient information to form a belief as to what plaintiff may have “noticed,” and denies that it does not take action in the event an employee complains of inappropriate employee remarks.

Paragraph 15

Denied.

Paragraph 16

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied. However, Washington Gas denies that plaintiff complained to Washington Gas about the allegations made in this paragraph.

Paragraph 17

Denied.

Paragraph 18

Denied.

Paragraph 19

Admitted.

Paragraph 20

Admitted.

Paragraph 21

The allegations in the first and second sentences of this paragraph are admitted. The allegations in the third sentence of this paragraph are denied.

Paragraph 22

Washington Gas admits that the camera in Gas Control showed plaintiff picking up his coat and walking out of the primary work area of Gas Control and that plaintiff was not on this camera for hours on a number of days.

Paragraph 23

Admitted.

Paragraph 24

Denied.

Paragraph 25

Denied.

Paragraph 26

Admitted.

Paragraph 27

Denied.

Paragraph 28

Washington Gas is without sufficient information to form a belief as to plaintiff's "awareness."

Paragraph 29

Admitted.

Paragraph 30

Admitted.

Paragraph 31

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Paragraph 32

Denied.

Paragraph 33

Admitted.

Paragraph 34

Denied.

Paragraph 35

Washington Gas denies that it discriminated against plaintiff on the basis of his race.

Paragraph 36

Denied.

Paragraph 37

Denied.

Paragraph 38

This allegation is duplicative of the allegation in Paragraph 37. Please see the answer to Paragraph 37 above.

Paragraph 39

Washington Gas denies that it has discriminated against any employee on the basis of race.

Paragraph 40

Denied.

Paragraph 41

Denied.

Paragraph 42

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Paragraph 43

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Paragraph 44

Admitted.

Paragraph 45

Denied.

Paragraph 46

Washington Gas denies that it discriminated against plaintiff on the basis of his race.

Paragraph 47

Denied.

Paragraph 48

Denied.

Paragraph 49

This allegation is duplicative of the allegation in Paragraph 48. Please see the answer to Paragraph 48 above.

Paragraph 50

Washington Gas denies that it has discriminated against any employee on the basis of race.

Paragraph 51

Denied.

Paragraph 52

Denied.

Paragraph 53

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Paragraph 54

Washington Gas is without sufficient information to form a belief at this time as to the truth of the allegations in this paragraph and therefore they are denied.

Third Defense

All allegations in the Complaint not explicitly admitted are denied.

Fourth Defense

Washington Gas denies that it has discriminated against plaintiff.

WHEREFORE, Washington Gas requests that this action be dismissed with prejudice, or alternatively, judgment be entered in its favor, and defendant be awarded its costs and reasonable attorney's fees and such other relief as the Court may deem just and proper.

Respectfully submitted,

WASHINGTON GAS LIGHT COMPANY
By Counsel

/s/

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(VA Bar # 30003)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of April, 2010, I caused a copy of the foregoing Answer to be filed electronically with the court and mailed, U.S. mail, first-class, postage prepaid, to Wilder Reed, 1701 Severn Tree Court, Severn, MD 21144

/s/
Ed Funk